

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES
NOS. 1-50.

Defendants.

Civil Action No. 1:22-cv-00187-LJV-JJM

NOTICE OF MOTION TO COMPEL PRODUCTION

PLEASE TAKE NOTICE THAT, upon the accompanying Motion to Compel Production, Memorandum of Law, and Declaration of Julianne Osborne, together with all exhibits, Defendant Skyrise, Inc., by and through its undersigned counsel, Latham & Watkins LLP, hereby moves this Court for an order requiring Plaintiff Moog Inc. to produce documents responsive to Skyrise's Requests for Production Nos. 5, 11, and 15:

- No. 5: All Documents and Communications relating to any confidentiality obligations owed to You by Your employees, Your customers, and/or Your suppliers, including, without limitation, Your efforts to investigate compliance with, and enforcement of, those confidentiality obligations.
- No. 11: All Documents and Communications regarding Moog's internal research, programs, and projects related to automated helicopter flight, including but not limited to, the cessation of any research, programs, and projects.
- No. 15: All Documents relating to Your efforts to maintain the secrecy of the alleged Trade Secrets, including without limitation (i) Documents sufficient to identify all

Persons who have accessed the alleged Trade Secrets; and (ii) Documents sufficient to show the confidentiality obligations of each such Person to You.

In accordance with Local Rule 7(a)(1), Skyryse reserves the right to file and serve reply papers. Skyryse respectfully requests that the hearing on Skyryse's Motion take place during the conference already scheduled on July 15, 2022, or at the Court's earliest convenience, and that Moog's opposition brief be due on July 11, 2022 and Skyryse's reply brief, on July 13, 2022.

Dated: June 30, 2022

/s/ Gabriel S. Gross

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